

Exhibit 138

MEMORANDUM

To: File

From: Sean Memon, Deputy Chief of Staff; Brian C. Rabbitt, Senior Policy Advisor

Date: August 20, 2018

Re: Meeting with Ripple Executives

On Monday, August 20, 2018, representatives from Ripple met with representatives from the Chairman's Office at the SEC's Washington, D.C. offices. Attendees for the Chairman's Office were Chairman Clayton, Bill Hinman (Director of the Division of Corporation Finance), Sean Memon, and Brian Rabbitt. Attendees for Ripple were Brad Garlinghouse (CEO) and David Schwartz (CTO).

The meeting began around 11 AM and lasted approximately 50 minutes. Garlinghouse and Schwartz spent the meeting discussing Ripple's business and technology. Representatives from the Chairman's Office occasionally interjected with questions. Towards the end of the meeting, Garlinghouse briefly noted that Ripple was in "purgatory" due to uncertainty as to whether XRP, the cryptocurrency with which Ripple is associated, is or is not a security. In response, Chairman Clayton immediately stated that the meeting was not the proper forum for a discussion about that topic. He then asked Garlinghouse to "back up" from that issue and steered the meeting back to a discussion about Ripple's business and technology. Following further discussion of those issues, the meeting concluded with Chairman Clayton encouraging the Ripple executives to continue its ongoing discussions with the staff of the Division of Corporation Finance.

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